

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Antwaun Daniels

Case No.

Case: 2:25-mj-30057

Assigned To : Unassigned

Assign. Date : 2/11/2025

Description: SEALED MATTER (DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 3, 2024 to October 21, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 656

Theft or embezzlement by a bank employee or agent.

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

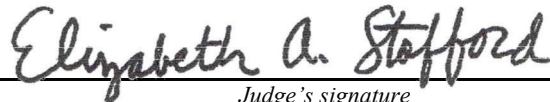
Mackenzie Reynolds, Special Agent (FBI)

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 11, 2025

City and state: Detroit, Michigan



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Mackenzie Reynolds, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been with the FBI since May 2024. My duties involve the investigation of complex financial crimes including theft and embezzlement, mail fraud, wire fraud, and money laundering. In addition to the new agent training I received at the FBI Academy, I have been a Certified Public Accountant since January 2018, have approximately eight years of financial experience, and have attended conferences and seminars on investigating financial crimes. At all times during the investigation described in this affidavit, I have been acting in an official capacity as a Special Agent of the FBI.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

3. This affidavit does not include every fact resulting from my investigation; rather, I have written a summary of the investigation to date to establish probable cause that ANTWAUN DANIELS committed violations of 18 U.S.C. § 656, theft or embezzlement by bank employee or agent.

PROBABLE CAUSE

4. Brink's Inc. ("Brink's") is headquartered in Richmond, Virginia. Its operations include transporting cash deposits and ATM replenishment and maintenance. Brink's operates in the Eastern District of Michigan, and acts as an agent for multiple FDIC-insured banks. Specifically, Brink's employees or messengers refill ATMs operated by FDIC-insured banks in the Eastern District of Michigan.

5. From approximately January 2024 to October 21, 2024, ANTWAUN DANIELS was an employee of Brink's in the Eastern District of Michigan. DANIELS was a messenger, and his duties included delivering and safekeeping money to ATMs serviced by Brink's.

6. On October 28, 2024, a Brink's Detroit Branch ATM Manager discovered large ATM shortages from the prior week; there was a sharp difference between the amounts of money intended to be delivered to the ATMs and the amount actually delivered. Upon further investigation, Brink's staff found there were ATM shortages for service dates including October 3, October 18, and October 21, 2024.

7. Brink's staff calculated the shortages using an internal proprietary system called Brinks Asset Management System (BAMS). Brink's tellers receive the messengers' cash bags and the ATM receipts, process the physical funds using

a currency counter, input the data into BAMS, and BAMS calculates the variances. There were twelve ATMs with shortages during these dates totaling \$592,160. These ATMs were owned by Bank of America, Comerica Bank, and JP Morgan Chase Bank—all FDIC insured banks.

8. According to Brink's records, Antwaun DANIELS was the messenger, or the sole employee responsible for delivering and safekeeping the cash to and from the twelve ATMs with shortages on October 3, 18, and 21, 2024.

9. On October 21, 2024, during his shift, DANIELS sent a text message to his supervisor at Brink's. DANIELS wrote that his grandfather was in the ICU, and that he (DANIELS) had to leave work. After returning his vehicle and vest at the end of his shift on October 21, 2024, DANIELS never returned to his employment at Brink's.

10. After Brink's staff discovered the ATM shortages described above in paragraphs 7, I reviewed video surveillance provided by Brink's from inside DANIELS's Brink's armored truck. The video from October 21, 2024, shows DANIELS lowering the driver's seat and unplugging the internal camera system. The camera system remained unplugged and did not capture footage of DANIELS servicing the ATMs on his route. Brink's staff were unable to retrieve the in-vehicle surveillance footage from October 3 and October 18, 2024, because the footage had been automatically purged prior to the discovery of the theft.

11. On November 13, 2024, a Brink's Corporate Security Manager and Brink's Detroit Route Manager spoke with DANIELS on the telephone regarding the ATM shortages. DANIELS spoke on the phone using the same cell phone number he used to contact his supervisor on October 21, 2024.

12. During the call, DANIELS agreed to return \$400,000, the amount believed to be missing at the time, to Brink's staff. DANIELS also admitted to unplugging the camera system in his truck. After the call, the Brink's Detroit Route Manager followed up with DANIELS by text message. The Manager attempted to set up a meeting with DANIELS, so DANIELS could return the missing \$400,000. However, DANIELS never provided a meeting location and stopped responding to Brink's staff.

Elements of the Offense

13. The elements of 18 U.S.C. § 656, theft or embezzlement by bank employee or agent, are the following:

- a. First, that at the time the offense occurred, the defendant was an officer, director, agent or employee of, or was connected in some capacity with, Bank of America, Comerica Bank, and JP Morgan Chase Bank.
- b. Second, that at the time the offense occurred, the banks were insured by the Federal Deposit Insurance Corporation;

- c. Third, that the defendant willfully misapplied or embezzled funds or credits belonging to the banks or entrusted to the care and custody of the banks;
- d. Fourth, that the defendant intended to injure or defraud the banks; and
- e. Fifth, that the amount defendant embezzled or misapplied was greater than \$1,000.

See Third Circuit Model Criminal Jury Instruction 6.18.656; Fifth Circuit Pattern Criminal Jury Instruction 2.28; *United States v. Crabtree*, 979 F.2d 1261 (7th Cir. 1992); Eighth Circuit Model Criminal Jury Instruction 6.18.656; Ninth Circuit Model Criminal Jury Instruction 8.41; Tenth Circuit Criminal Pattern Jury Instruction 2.23; Eleventh Circuit Pattern Criminal Jury Instructions, Offense Instruction 22.

14. The phrase “connected in some capacity” in the first element is read broadly and includes drivers for armored car services contracted with FDIC-insured banks. *United States v. Gillett*, 249 F.3d 1200, 1202-1203 (9th Cir. 2001).

15. Here, 1) the twelve ATMs at issue belonged to three FDIC-insured banks; 2) Brink’s acted as the banks’ agent when refilling the ATMs; 3) DANIELS was an employee of Brink’s at the time of the thefts; 4) DANIELS intended to

injure or defraud the banks; and 5) DANIELS embezzled over \$1,000 belonging to the banks.

CONCLUSION

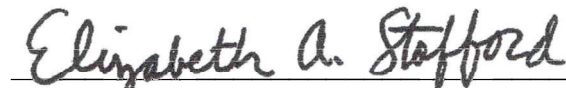
16. Based on the above information, there is probable cause that ANTWAUN DANIELS committed violations of 18 U.S.C. § 656, theft or embezzlement by bank employee or agent.

Respectfully submitted,



Mackenzie Reynolds, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Elizabeth A. Stafford
United States Magistrate Judge